

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SJUNDE AP-FONDEN and THE
CLEVELAND BAKERS AND
TEAMSTERS PENSION FUND,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

GENERAL ELECTRIC COMPANY, et al.,

Defendants.

17 Civ. 08457 (JMF) (GWG)

NOTICE OF MOTION FOR CLASS CERTIFICATION

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that the undersigned attorneys for Lead Plaintiff Sjunde AP-Fonden and Additional Plaintiff The Cleveland Bakers and Teamsters Pension Fund (“Plaintiffs”) hereby move before the United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, for an order as follows:

- (1) certifying this action as a class action pursuant to Federal Rules of Civil Procedure 23(a) and 23(b)(3), with the class (“Class”) defined as follows:

All persons and entities that purchased or acquired GE common stock between March 2, 2015 and January 23, 2018, inclusive (the “Class Period”) and were damaged thereby, excluding (a) Defendants; (b) GE’s subsidiaries and affiliates; (c) any officer, director, or controlling person of GE, and members of the immediate families of such persons; (d) any entity in which any Defendant has a controlling interest; (e) Defendants’ directors’ and officers’ liability insurance carriers, and any affiliates or subsidiaries thereof; and (f) the legal representatives, heirs, successors, and assigns of any such excluded party;

- (2) appointing Plaintiffs as Class Representatives of the proposed Class; and
- (3) appointing Kessler Topaz Meltzer & Check, LLP, as Lead Counsel for the Class and Grant & Eisenhofer P.A. as Liaison Counsel for the Class;

PLEASE TAKE FURTHER NOTICE that a Memorandum of Law, Declaration of Sharan Nirmul and exhibits thereto, are submitted herewith in support of this application.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

Dated: May 21, 2021

Respectfully submitted,

**KESSLER TOPAZ MELTZER &
CHECK, LLP**

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Counsel for Additional Plaintiff Cleveland Bakers and Teamsters Pension Fund and Proposed Liaison Counsel for the Class